

BENJAMIN BRAFMAN

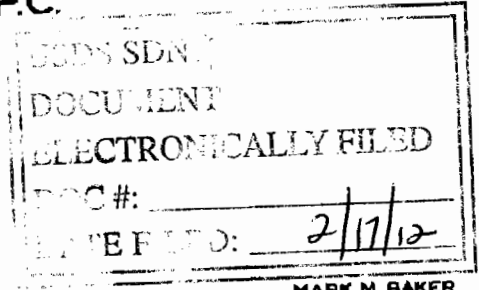
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ADMITTED IN N.Y. AND N.J.

February 9, 2012

Via Facsimile (212) 805-6326

Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1350  
New York, New York 10007

Re: USA v. Menachem Youlus  
12 Cr. 36 (CM)

Dear Judge McMahon:

MEMO ENDORSED

Please accept this letter as an application to modify Defendant Rabbi Menachem Youlus's travel restrictions for a brief period during April 2012.

Specifically, Defendant requests to travel to St. Louis Park, Minnesota, together with members of his family, including his wife and seven of his nine children, between April 3, and April 16, 2012. He will be residing at the home of his sister and her family, in South St. Louis Park.

The purpose of the visit is several-fold: Aside from spending the Passover holiday together with his immediate and extended family, Rabbi Youlus plans to seek the professional services of Rabbi Earl Goldberger, a local mental health specialist. He also intends to seek a second opinion, regarding a proposed cardiac procedure, from Dr. Jay Cohn of the University of Minnesota, who is a peer of Dr. Gerald Insel, Defendant's cardiologist at Good Samaritan Hospital in Baltimore, Maryland. (As the Government is aware, Defendant has had ongoing cardiac emergencies that have greatly impeded his health in recent months.)

*2/17/2012  
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**BRAFMAN & ASSOCIATES, P.C.**

Additionally, because of the great levels of stress which the entire family has endured since the commencement of this case, including the overbearing adverse publicity that had preceded the filing of these charges, Defendant's wife and children will also be receiving group counseling from Rabbi Goldberger, whose office is located in St. Louis Park, as well as from additional mental health practitioners. The reason that this time period was selected was because, over the Passover holiday, the whole family can be together, as none of the children will have to miss school. The trip will be facilitated because Defendant's sister and her family are willing to house Defendant's entire family at this time.

While in Minnesota, Defendant does not intend to do any traveling beyond meeting with these noted physicians and mental health professionals. Any further activities will be confined to visiting local parks, libraries, and worship at the local synagogue.

I have discussed this application with United States Pre-trial Services Officer John Moscato who has given his consent. In addition, Assistant United States Attorney Janis Echenberg has informed me that since Pre-Trial approves the request, the Government has no objection.

Respectfully submitted,



MARK M. BAKER

cc: USPO John Moscato  
AUSA Janis Echenberg  
(Via email)